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October 18, 2007



DDW

Commissioner of Patents and Trademarks
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

ATTN: Alicia M. Torres

Dear Ms. Torres,

I received your interview summary form PTOL-413 with the previously submitted form PTOL-413A and attachments related to our interview on October 12, 2007. My client and I thank you and Mr. Will for your time. I submit to you the following complete written statement in summary of the interview as required by MPEP 713.03 and 37 C.F.R. 1.133(b).

Interview Summary

Inventors Daniel C. and Daniel J. Heinz and I met with you and your supervisor, Tom Will, at which time Daniel C. Heinz demonstrated the current prototype of the invention claimed in pending U.S. patent application 10/715,192 in order to elucidate features that distinguish that invention over the cited prior art, particularly U.S. Pat. No. 2,478,558. We also discussed claim amendments proposed at the interview that purport to read over the '558 patent. In your interview summary, you indicated that you and Mr. Will agreed the proposed amendments read over the '558 patent. The amendments proposed are to claims 18 and 20 of the '192 application, previously presented, were included as an attachment to your interview summary.

In addition to agreeing that the amended claims read over the '558 patent, Mr. Will suggested using means-plus-function language in claim 18 to replace the proposed language, "said drive shafts remaining parallel to said grass guide throughout its full range of angular adjustment," that will provide for a mounting means that allows the shafts and blade to remain parallel during movement (see line 11 of claim 18). I will address this suggestion in the next amendment.

I also noted that the language "lowest plane of rotation" should be changed to "lowest blade point" or something similar (see line 15 of claim 18).

Mr. Will also suggested labeling the proposed "first arch-like rectangular structure" as a housing and "second arch-like rectangular structure" as an arched adjustment plate (claim 20, lines 3 and 4). I will take this suggested approach in the next amendment and provide additional definition in the specification to account for any ambiguity that is created. Mr. Will also suggested removing the width limitation applied to those components (claim 20, line 4). I will also take that suggestion in the next amendment.

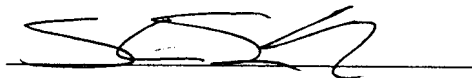
It was also suggested by the examiners that further amendment be made to claim 20 to provide a clear understanding of the proposed adjustment methodology, and Mr. Will again suggested using means-plus-function language to cover the angular adjustment feature of the apparatus. I will address this in the next amendment as well.

Conclusion

On behalf of the applicants and myself, I thank both Ms. Torres and Mr. Will for their suggestions at the interview and shall amend the claims in order to address all of the concerns discussed above. I plan to submit the next amendment before the end of the shortened statutory period for response. We also realize that Ms. Torres will conduct an additional search following receipt of the next amendment, but that if only minor changes need to be made following the search, we may be given the opportunity to address them by telephone, and will certainly appreciate that courtesy if it is appropriately extended.

The total number of pages enclosed in this submission is two.

Sincerely,



Steven S. Lloyd
Registered Patent Agent No. 56,650

10/18/07

Date